

Regulatory Unit

Monthly Performance Report

June 2000

**Office of Safety
Regulation of the
RPP-WTP
Contractor**

**August 2000
Environmental Management
Performance Report Submittal**

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EXECUTIVE OVERVIEW

EXECUTIVE SUMMARY

In June 2000, DOE issued a notice of termination to BNFL Inc. (BNFL) for all work associated with Contract DE-AC27-96RL13308. The Department plans to transition the ongoing workscope to CH2M Hill Hanford Group, Inc. (CHG) until the new design and construct contractor is in place. In the interim, the Regulatory Unit (RU) is meeting once a week with BNFL, CHG, and ORP to assure an effective and efficient transition of regulatory matters. These transition meetings will continue until the contract termination date of July 28, 2000.

Termination of the BNFL contract has impacted all in-progress RU review activities. The RU generated a list of preferred activities for BNFL to complete before the July 28, 2000, termination date; however, BNFL's current interpretation of the notice of termination permits the performance of termination activities only. To facilitate an efficient and effective transition, the RU has also provided the list to CHG for workscope costing and planning.

To conduct the transition of regulatory activities efficiently and effectively with CHG, the RU provided CHG with RL/REG-2000-20, *Regulatory Unit Position on Important to Safety Work Authorization for the RPP-WTP Interim Design Period*. In keeping with the EM-1 mandate that the independent role of the RU be incorporated in the bridging contract and the RFP, the Regulatory Official requested that ORP provide the RU with the appropriate contractual standing with CHG to provide an authorized mechanism for the RU to regulate safety activities. As of July 13, 2000, ORP has not provided the RU with the requested contract standing. The RU plans to continue to communicate with CHG, until this issue is resolved with ORP.

Fiscal year-to-date efficiencies, work slowdowns and deferrals have resulted in a forecast underrun of approximately \$1M to the current budget. Of this underrun \$750K is a result of efficiencies and is being made available for reprogramming to support other RL site priorities. A Class I change request will be processed to formally document these baseline changes.

Major RU activities during June are detailed below.

MONTHLY HIGHLIGHTS

Position Paper on Interim Design Period Work Authorization

Upon termination of the privatization contract, work may continue on River Protection Project Waste Treatment Plant (RPP-WTP) design during an interim design phase until such time that a new design and construction contract is in place. The interim design phase work, if any, will be performed by CHG. EM-1 has provided direction to maintain the RPP-WTP regulatory and authorization basis through contract transitions. In keeping with this direction, the RU developed RL/REG-2000-20. This paper describes revision of the authorization basis to accommodate important-to-safety RPP-WTP work performed by CHG, and the authorization of CHG to perform that work.

Limited Construction Authorization Request Review

The RU completed its acceptability review of the BNFL Limited Construction Authorization Request (LCAR) for the RPP-WTP, which was submitted on June 26, 2000. To reach a determination on continuing with a detailed review, RU reviewers assessed the submittal against the criteria of the LCAR Review Guidance that was previously provided to and commented on by BNFL. The RU determined that the LCAR was not acceptable for detailed review. In general, the RU found that only limited additional information was necessary for the RU to continue its review. Because BNFL does not plan to resubmit the LCAR prior to termination, the RU will conduct a detailed review of those parts of the LCAR that were acceptable for detailed review and provide CHG with questions and comments for their consideration in resubmitting the LCAR.

Review of the BNFL Non-radiological Worker Safety and Health Plan

The RU completed its review of this BNFL document and prepared a draft assessment report, RL/REG-2000-21, *Regulatory Unit Assessment of the Non-radiological Worker Safety and Health Plan*, which defines the BNFL construction safety program. The Report reflects the Contractor's response to two sets of questions from the RU. The Report will be issued in July for BNFL and public comment. BNFL plans to provide CHG with the Non-radiological Worker Safety and Health Plan and the RU evaluation report during the transition.

Review of the BNFL QA Program and Implementation Plan

On June 26, 2000, BNFL submitted to the RU for review and approval its Quality Assurance Program and Implementation Plan (QAPIP) for Design and Construction. The RU completed its acceptability review of the Plan and determined the Plan was acceptable for detailed review. The RU was conducting its detailed review of the QAPIP when the termination of the BNFL Contract was announced. The RU plans to complete its review and provide its questions to BNFL prior to termination on July 28, 2000. BNFL will provide CHG with the Plan; the RU questions on the Plan, and the RU draft evaluation report as turnover documents. The Plan has been placed on the RU Website.

Review of BNFL Authorization Basis Amendment Requests

At the time of the notice of termination, the RU was reviewing 13 authorization basis amendment requests (ABARs). Several of the ABARs will be approved and the remainder will require additional information and revision. BNFL plans to provide CHG with the RU comments on the ABARs as part of the transition documents.

Design Reviews

The RU observed 11 BNFL design reviews in June. The design media reviewed during June was more developed than that delivered to ORP on April 24 as part of the Part B-1 Contract deliverables. For example, some piping and instrumentation diagrams included control logic and identification of what

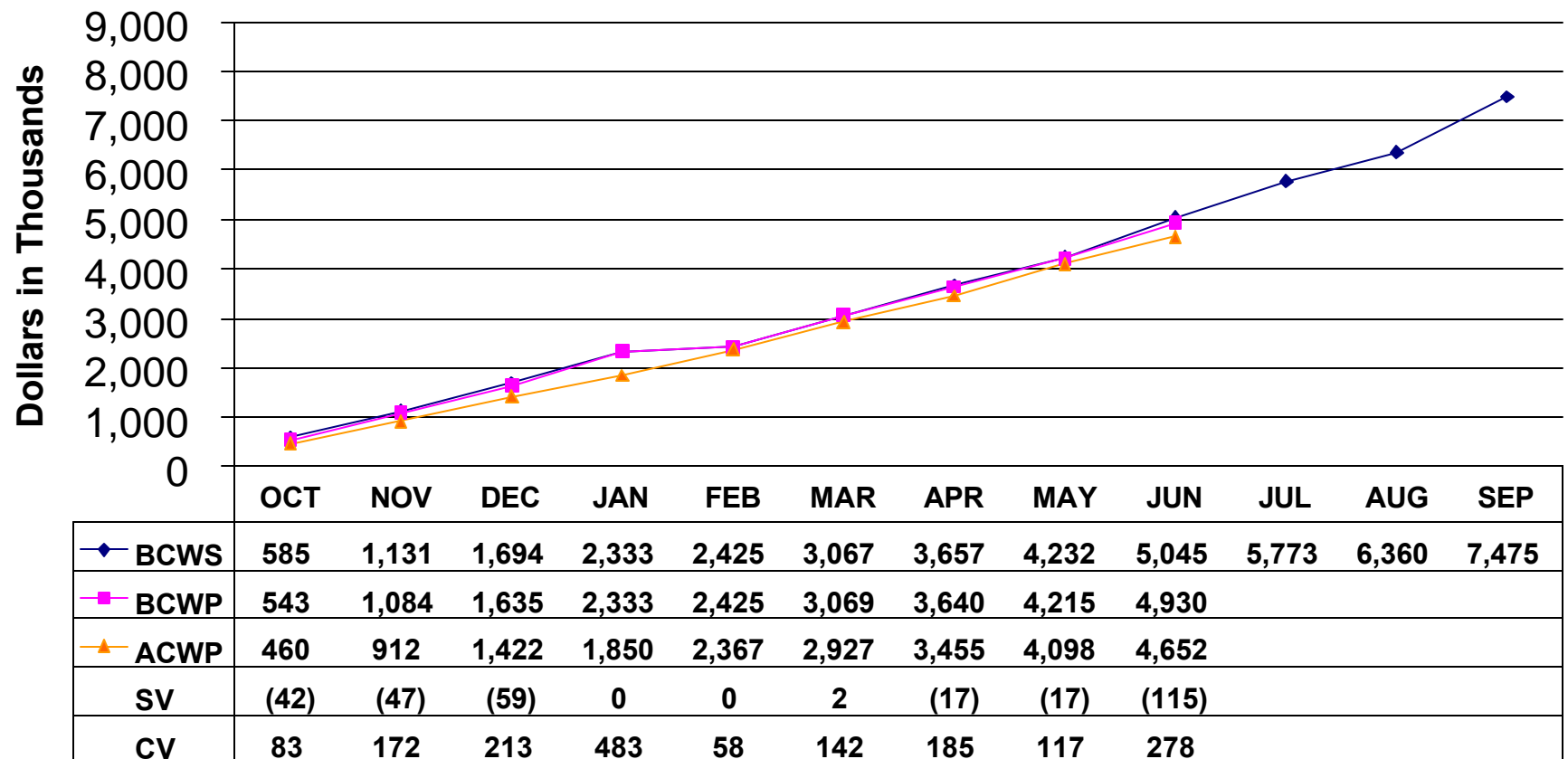
instruments were classified as important to safety. Due to termination of the Contract, BNFL has discontinued the design reviews.

Topical Meetings

The June Topical Meeting was held to disposition issues remaining open from previous meetings. In preparation for this meeting, the RU identified 15 priority issues that required resolution to expedite its review of the Construction Authorization Request. BNFL provided status on all 15 issues and addressed in detail the issues of hydrogen monitoring, cesium storage tank cooling, chemical hazards evaluation, and standards selection. Due to time constraints, BNFL's presentation on the control strategy for nitrogen oxide accumulation in the low activity waste melter and its associated off-gas system were rescheduled for July 13, 2000. However, due to the notice of termination, BNFL has cancelled this meeting and the Topical Meeting scheduled in July 2000.

Policy for Training and Training Plan

The RU completed an update to RL/REG-97-07, *Regulatory Unit Policy for Training and Training Plan*. The RU Training Policy emphasizes competence to perform assigned duties and a systematic approach to training (SAT) to maintain such competence. The training framework is based on conformance with the internal processes of RL.

COST PERFORMANCE (Graph)**Regulatory Unit Cost Performance**

COST PERFORMANCE SUMMARY

The fiscal year-to-date performance through June reflects a favorable cost variance of \$278K and an unfavorable schedule variance of \$115K. The favorable cost variance is a result of lower than anticipated costs associated with observing Design Reviews, providing training for RU staff, development of CAR review handbooks, and writing inspection procedures. The unfavorable schedule variance is primarily due to BNFL withdrawing their Radiation Protection Program (RPP), which was determined to be unacceptable by the RU after a one-week acceptability review.

NEAR-TERM LOOK AHEAD

The termination of the BNFL contract impacted a majority of FY 2000 RU work activities. Many of these activities, as shown below, had major milestones associated with their completion dates. Until a new baseline is approved, these dates will be shown as "TBD".

	Planned Due Date
July	
• Begin review of Contractor's resubmitted RPP for Design and Construction	TBD
• Conduct QA Inspection	TBD
• Issue AR on BNFL Non-Radiological Worker Safety and Health Plan	7-21-00
• Conduct Topical Meeting on Seismic PRA	TBD
• Issue SAP Review Handbook	7-31-00
August	
• Conduct ALARA Inspection	TBD
• Present 15 th Quarterly Briefing to Headquarters	8-17-00
• Issue QA Inspection Report	TBD
• Issue ER on BNFL QAPIP	8-22-00
September	
• Commence Review of BNFL ISMP Revision	TBD
• Issue ALARA Inspection Report	TBD
• Conduct Configuration Management Inspection	TBD
• Commence Review of BNFL HAR Revision	TBD
• Issue CAR Review Handbook	TBD
• Issue FY 2001 Program Management Plan	9-29-00

PROGRAM PERFORMANCE OVERVIEW

PERFORMANCE SUMMARY (Chart) – Program Direction and Program Support

		DOLLARS IN \$000's					FY 2000		
		BCWS	BCWP	ACWP	SV	CV	BAC	EAC	Delta
RU1	Program Management								
	<i>Program Direction</i>	\$1.082	1.082	1.092	0	(\$10)	\$1.462	1.495	(\$33)
	<i>Program Support</i>	1.162	1.162	1.148	0	14	1.656	1.541	115
	Total RU1 -----	2,244	2,244	2,240	0	4	3,118	3,036	82
RU2	Regulatory Policy & Practices								
	<i>Program Direction</i>	106	106	115	0	(9)	143	152	(9)
	<i>Program Support</i>	316	316	278	0	38	410	323	87
	Total RU2 -----	422	422	393	0	29	553	475	78
RU5	Recurring Safety Reviews								
	<i>Program Direction</i>	329	320	295	(9)	25	435	385	50
	<i>Program Support</i>	1,076	994	947	(82)	47	1,406	1,251	155
	Total RU5 -----	1,405	1,314	1,242	(91)	72	1,841	1,636	205
RU6	Construction Authorization								
	<i>Program Direction</i>	136	136	70	0	66	245	241	4
	<i>Program Support</i>	124	124	94	0	30	402	270	132
	Total RU6 -----	260	260	164	0	96	647	511	136
RU9	Oversight & Inspections								
	<i>Program Direction</i>	197	185	186	(12)	(1)	276	285	(9)
	<i>Program Support</i>	415	403	343	(12)	60	598	460	138
	Total RU9 -----	612	588	529	(24)	59	874	745	129
RU10	Special Projects								
	<i>Program Direction</i>	\$9	9	9	0	\$0	\$9	9	\$0
	<i>Program Support</i>	93	93	75	0	18	432	220	212
	Total RU10 -----	\$102	102	84	0	\$18	\$441	229	\$212
Total Regulatory Unit Program									
	<i>Program Direction</i>	\$1.859	1.838	1.767	(21)	\$71	\$2.570	2.567	\$3
	<i>Program Support</i>	3,186	3,092	2,885	(94)	207	4,904	4,065	839
	Total RU Program-----	\$5,045	4,930	4,652	(115)	\$278	\$7,474	6,632	\$842

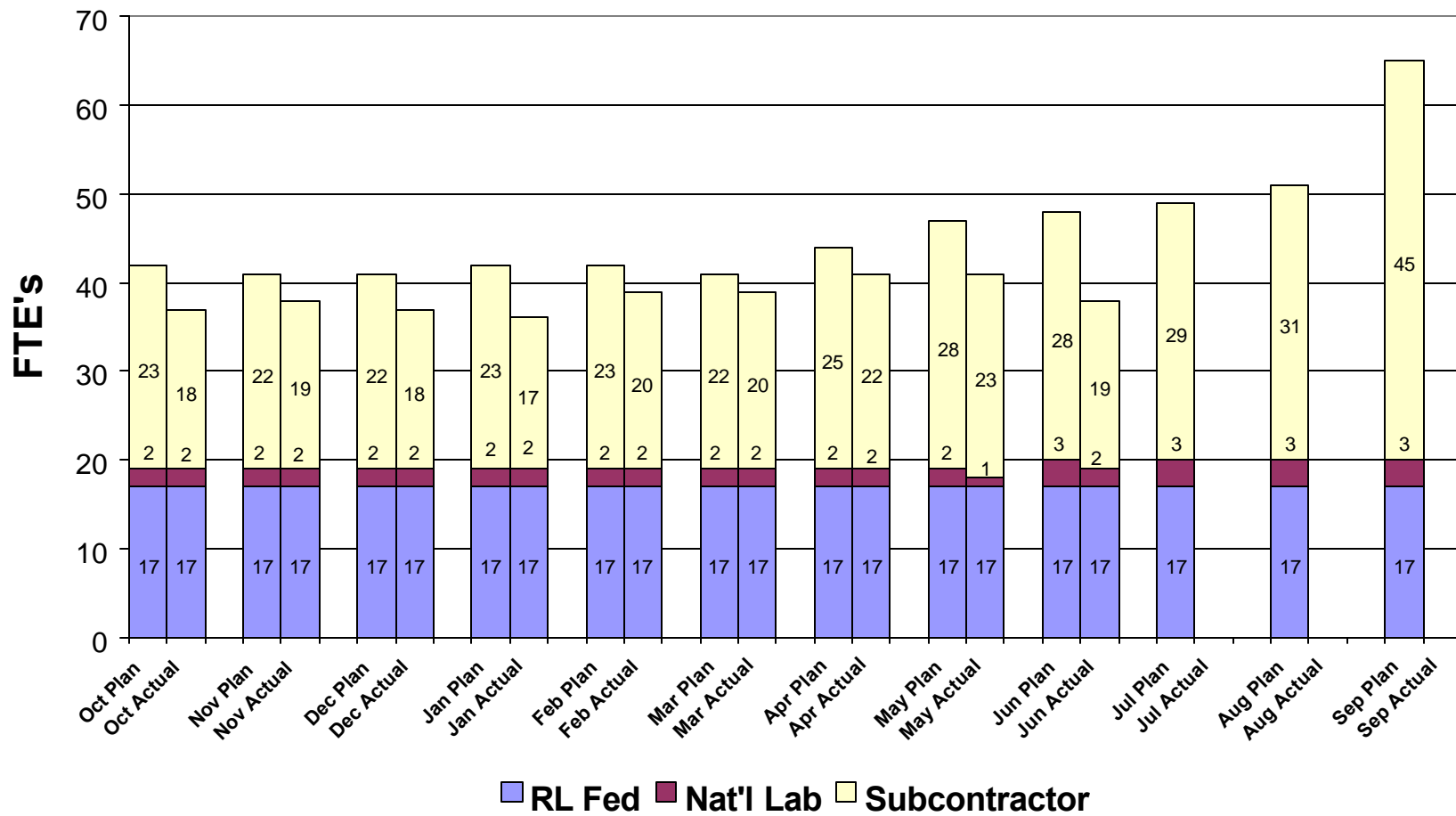
MILESTONE CONTROL LOG

MILESTONE CONTROL LOG							
MILESTONE		WBS	MILESTONE DESCRIPTION	BASELINE COMPLETION DATE	SCHEDULE STATUS	FORECAST COMPLETION DATE	ACTUAL COMPLETION DATE
TYPE	NUMBER						
<u>FISCAL YEAR 2000</u>							
RL	00-010	RU902	Standards Selection Inspection rpt issued	10/12/99	Complete	10/06/99	10/06/99
RL	00-011	RU902	Authorization Basis Inspection rpt issued	11/08/99	Complete	12/13/99	12/13/99
RL	00-012	RU902	Safety Integration Inspection rpt issued	12/07/99	Complete	12/03/99	12/03/99
FO	00-013	RU203	IH&S Plan issued	5/10/00	Complete	5/10/00	5/10/00
FO	00-015	RU205	Revised Interface Plan issued	1/31/00	Complete	1/28/00	1/28/00
RL	00-016	RU902	Design Process Inspection rpt issued	2/14/00	Complete	2/08/00	2/08/00
RL	00-017	RU902	Employee Concerns Program Inspection rpt issued	3/13/00	Complete	3/10/00	3/10/00
RL	00-018	RU902	Training & Qualifications Inspection rpt issued	4/07/00	Complete	4/05/00	4/05/00
RL	00-019	RU608	SAP Rvw Handbook issued	7/31/00	On Schedule	7/31/00	
RL	00-027	RU608	Initiate Review of SAP	9/01/00	On Schedule	9/01/00	
RL	00-020	RU605	LCAR Planning Handbook issued	6/16/00	Complete	6/16/00	6/16/00
FO	00-004	RU502	ER & Approval of QAPIP Rev. 6 issued	9/22/00	Ahead	8/22/00	
RL	00-014	RU902	Standards Implementation Inspection rpt issued	9/29/00	TBD	TBD	
RL	00-026	RU605	Initiate Review of LCA Request	6/27/00	Complete	6/27/00	6/27/00
FO	00-002	RU204	Openness Plan Rev. 3 issued	6/30/00	Complete	6/30/00	6/30/00
RL	00-021	RU902	QA Inspection rpt issued	7/28/00	Behind	8/18/00	
RL	00-022	RU602	CAR Planning Handbook issued	9/29/00	On Schedule	9/29/00	
FO	00-023	RU502	Approval of RPP Rev. #3 issued	9/01/00	TBD	TBD	
RL	00-024	RU902	Corrective Actions Inspection rpt issued	5/30/00	Complete	5/31/00	5/31/00
RL	00-025	RU902	ALARA Inspection rpt issued	9/11/00	On Schedule	9/11/00	

MILESTONE CONTROL LOG							
MILESTONE		WBS	MILESTONE DESCRIPTION	BASELINE COMPLETION DATE	SCHEDULE STATUS	FORECAST COMPLETION DATE	ACTUAL COMPLETION DATE
TYPE	NUMBER						
FO	00-003	RU102	FY 2001 PMP issued	9/29/00	On Schedule	9/29/00	

FULL-TIME EQUIVALENCY PROFILE (Graph)

Regulatory Unit FTE Profile



CHANGE CONTROL STATUS LOG

Regulatory Unit FY 2000 Change Control Log							
CIN#	Change Classified.	Author	WBS#	Date Change Originated	Change Request Explanation	CEB Review Date	CEB Disposition
00-001	I	K.D. Grindstaff	1.10	11/99	Processing of the FY 1999 Carryover into FY 2000 Baseline and Realignment of FY 2000 Cost Savings to Emergent Priority Workscope.	11/24/99	Approved
00-002	II	K.D. Grindstaff	1.10	12/99	Added new emergent workscope associated with impact risk balancing between TWRS and the TWRS-P facility.	12/03/99	Approved
00-003	III	K.D. Grindstaff	1.10	1/00	Redistributed funds associated with a task package titled Other Direct Cost (0424ODC).	1/18/00	Approved
00-004	II	K.D. Grindstaff	1.10	1/00	Renamed Cost Account RU1002 from K Basin SAR to Misc. RU Reg. Activities and separated the CAP into three tasks; K Basin SAR, RL Quality Assurance Program Plan, and WIPP Reg. Program Development.	1/20/00	Approved
00-005	I	K.D. Grindstaff	1.10	2/00	Implemented the most recent resource/activity planning effort, utilizing the Project's FYTD cost savings. Mid-year rebaselining effort.	2/25/00	Approved
00-006	II	K.D. Grindstaff	1.10	5/00	Initiated the detailed review of the BNFL process and facility design, which will provide the RU a current understanding of the BNFL process and facility design.	5/02/00	Approved
00-007	I	K.D. Grindstaff	1.10	5/00	Aligned the RU to the latest BNFL schedule delay prior to the decision to terminate the BNFL Hanford Contract.	5/30/00	Approved
00-008	II	K.D. Grindstaff	1.10	6/00	Implemented workscope to support decisions related to the relative risk of TWRS compared to the TWRS-P facility.	6/22/00	Approved